

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG DISPLAY CO., LTD.,

Plaintiff,

v.

AU OPTRONICS CORPORATION;
AU OPTRONICS CORPORATION
AMERICA; CHI, MEI OPTOELECTRONICS
CORPORATION; and CHI MEI
OPTOELECTRONICS USA, INC.,

Defendants.

C.A. No. 06-726-JJF

CONSOLIDATED CASES

AU OPTRONICS CORPORATION,

Plaintiff,

v.

LG DISPLAY CO., LTD. and
LG DISPLAY AMERICA, INC.,

Defendants.

C.A. No. 07-357-JJF

**DECLARATION OF ARIS K. SILZARS
IN SUPPORT OF AUO'S RESPONSE
TO LGD'S CLAIM CONSTRUCTION BRIEFING ON AUO'S PATENTS**

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September 4, 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG PHILIPS LCD, CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION; AU OPTRONICS
CORPORATION; AU OPTRONICS
CORPORATION AMERICA; TATUNG
COMPANY; TATUNG COMPANY OF
AMERICA, INC.; AND VIEWSONIC
CORPORATION,

Defendants.

Civil Action No.: 06-726-JJF

DECLARATION OF ARIS K. SILZARS

I, Aris K. Silzars, declare under penalty of perjury as follows:

1. I make this declaration in support of AU Optronics Corporation's ("AUO") Opposition to LGD's Opening Claim Construction Brief.
2. I have been an independent consultant in field of display technology since 1995. I assist established and emerging information display companies. Prior to that, I was the Director of the Display Research Laboratory at Sarnoff Corporation.
3. I was formerly the president of the Society for Information Display ("SID"), an international society of display professionals founded in 1962, from 2000 to 2002. With over 7000 members, SID is the premier organization of display professionals and academics in the fields of display research, design, manufacturing, applications, standards development, and marketing. I am currently the chair of the SID Publications Committee responsible for all SID publications, including Information Display Magazine, the SID/Wiley book series and the Journal of the SID, the world's leading technical publications devoted to display technology.

4. I received a B.A. in Physics from Reed College in 1963, an M.A. in Physics from the University of Utah in 1965, and a Ph.D. in Electrical Engineering from the University of Utah in 1969. A true and correct copy of my curriculum vitae is attached hereto as Exhibit 1.

5. My area of expertise encompasses the fields of information display technology, liquid crystal devices, digital integrated circuits and systems, mechanical design and packaging for electronic products and semiconductor technology.

6. I have authored over 100 publications, mostly related to display technology. I am also a named inventor on eleven patents, most of which are related to or in the field of display technology.

7. I have been retained by Wilson Sonsini Goodrich & Rosati, P.C. as an expert consultant in connection with a lawsuit between AUO and LG Philips LCD, Co., Ltd. ("LPL") concerning several patents that I understand are assigned to AUO.

8. The facts stated herein are based on my expert knowledge, and my review of U.S. Patent No. 6,689,629.

9. I understand that LGD has taken the position that the dummy conductive patterns described in U.S. Patent No. 6,689,629 (the "'629 Patent") cannot be connected to any voltage. I disagree with LGD's position for the following reasons.

10. The conductive patterns in question are referred to as "dummy" conductive patterns because they perform no function in the operation of the display. As described in the '629 Patent, the purpose of the patterns is to increase the density of the material to be etched in certain regions between the pixel electrodes and the pads where there is little or no wiring. The result is that etching of the material, during manufacturing, will be more uniform in these regions. More uniform etching results in better quality wiring.

11. Based at least on this purpose, that of enabling more uniform etching in areas where the density of material to be etched is low, a person of ordinary skill in the art would recognize that 30% or more of the layer of wiring on an LCD substrate would not consist of dummy conductive patterns.

12. The dummy conductive patterns perform no function in the operation of the display. In fact, for this reason, according to the claim language, a dummy conductive pattern

is not connected to any of the wiring that is used to convey signals between the transistor array and the system.

13. However, the dummy conductive patterns could be connected to ground, or to a voltage supply, and still be dummy conductive patterns, for at least two reasons.

14. First, merely connecting a conductor to ground, or to a supply voltage, does not cause that conductor to conduct any current. A conductor will not conduct current unless it is connected to a voltage differential, such as between a supply voltage and a ground.

15. Second, the dummy patterns are not connected to any of the wiring that communicate with the TFT array or other component used to operate the display. Therefore, a voltage could be applied to a dummy pattern or a dummy pattern could be connected to a ground terminal without causing the dummy pattern to conduct any signal or perform any function.

16. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3 day of Sept 2008 at Sammamish, Washington.

By: 
Dr. Aris K. Silzars

CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on September 4, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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September 4, 2008

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